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PLEASE RESPOND TO OUR  
NEW JERSEY OFFICE

March 21, 2025

**VIA EMAIL & ECF:**

**(Failla NYSDChambers@nysd.uscourts.gov)**

U.S.D.J. Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**MEMO ENDORSED**

**Re: Bradley Haller v. Sulman Usman, et al.**

**Docket No.: 1:24-CV-00977 (KPF)**

Dear Judge Failla:

We represent the Plaintiff in the above noted matter and submit this letter jointly with Stacy L. Ceslowitz, attorney for the Defendants. The parties have reached a settlement of the within matter. The parties' proposed Settlement Agreement includes a right to seek enforcement of the settlement terms as well as a confidentiality provision. Both provisions are critical to the parties.

As discussed with Daniel of Your Honor's Chambers, the parties would like this Court to retain jurisdiction to enforce the Settlement Agreement, while preserving the confidentiality provision therein. Therefore, please accept this letter as the parties' formal request for Court approval to file the executed Settlement Agreement under seal, as an exhibit to the forthcoming stipulation of dismissal with prejudice.

Thank you for your anticipated attention to this matter. We look forward to hearing from you regarding same.

Respectfully Submitted

**Pearce Law, LLC**



Jill Horton-Miller

cc: Stacy L. Ceslowitz

Application GRANTED. The parties may file the executed settlement agreement under seal, as an exhibit to the forthcoming stipulation of dismissal. The parties are advised that, should a dispute arise regarding the terms of this settlement agreement, the Court may unseal the settlement agreement.

The Clerk of Court is directed to terminate the pending motion at docket entry 32.

Dated: March 21, 2025  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE